

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

TEHUM CARE SERVICES, INC., *et al.*,<sup>1</sup>

Debtor(s).

## Chapter 11

Case No. 23-90086 (CML)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE  
OF ALL NOTICES, PLEADINGS, ORDERS, AND OTHER PAPERS**

PLEASE TAKE NOTICE that the law firm of Munsch Hardt Kopf & Harr, P.C., by and through below-referenced counsel, hereby makes an appearance as Special Deputy Attorneys General on behalf of the State of Idaho, the Idaho Department of Corrections, and certain officials or employees of the State of Idaho (collectively, the “State of Idaho Parties”) in the above-captioned proceeding (the “Bankruptcy Case”), and files this *Notice of Appearance and Request for Service of All Notices, Pleadings, Orders and Other Papers* (the “Notice of Appearance”) to request, pursuant to Fed. R. Bankr. P. 2002, 3017, 9007, and 9010 and 11 U.S.C. §§ 342 and 1109(b), that all notices given or required to be given in the Bankruptcy Case, and that all pleadings, orders and other papers served or required to be served in the Bankruptcy Case, be given and served upon:

John D. Cornwell  
Brenda L. Funk  
MUNSCH HARDT KOPF & HARR, P.C.  
700 Milam Street, Suite 800  
Houston, Texas 77002-2806  
Telephone: (713) 222-1470  
Facsimile: (713) 222-1475  
jcornwell@munsch.com  
bfunk@munsch.com

<sup>1</sup> The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

-and-

Randall W. Miller  
MUNSCH HARDT KOPF & HARR, P.C.  
500 N. Akard Street, Suite 3800  
Dallas, Texas 75201-6659  
Telephone: (214) 855-7539  
Facsimile: (214) 855-7584  
rwmiller@munsch.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes, without limitation, motions, applications, complaints, demands, notices of motions, notices of applications, notices of hearing, petitions, objections, answers, responses, replies, claims, schedules, statements, operating reports, plans, disclosure statements, and all other pleadings, requests or notices, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, other commercial carrier, hand delivery, facsimile, telegraph, telex, e-mail, telephone or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice is not intended to be, and shall not constitute, consent by the State of Idaho Parties to the Bankruptcy Court's subject matter jurisdiction, personal jurisdiction, or core jurisdiction.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance shall neither constitute nor be deemed or construed as (a) waiver of the right to have final orders in non-core matters entered only after de novo review by the United States District Court; (b) waiver of the right to trial by jury in any proceeding to which such right exists in the Bankruptcy Case or in any case, controversy, or proceeding related to the Bankruptcy Case; (c) waiver of the right to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (d) waiver of the right to contest jurisdiction or appropriate venue in the Bankruptcy Case or in any related proceeding; (e) waiver of the sovereign or any statutory immunity of the State of Idaho or any department, agency or subdivision thereof; or (f) waiver of

any other rights, claims, actions, defenses, setoffs or recoupments which the State of Idaho Parties have or may hereafter obtain, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments the State of Idaho Parties hereby expressly reserves.

Dated: April 24, 2023.

Respectfully submitted,

**MUNSCH HARDT KOPF & HARR, P.C.**

By: /s/ John D. Cornwell

John D. Cornwell

Texas Bar No. 24050450

Brenda L. Funk

Texas Bar No. 24012664

700 Milam Street, Suite 800

Houston, TX 77002-2806

Telephone: 713.222.1470

Facsimile: 713.222.1475

jcornwell@munsch.com

bfunk@munsch.com

Randall W. Miller

Texas Bar No. 24092838

500 N. Akard Street, Suite 3800

Dallas, Texas 75201-6659

Telephone: 214.855.7539

Facsimile: 214.855.7584

rmiller@munsch.com

**SPECIAL DEPUTY ATTORNEYS  
GENERAL FOR THE STATE OF  
IDAHO PARTIES**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 24<sup>th</sup> day of April, 2023, a true and correct copy of the foregoing Notice of Appearance was served electronically through the Court's ECF transmission facilities on all parties registered to receive ECF notice in the above-captioned case.

/s/ John D. Cornwell

John D. Cornwell

Texas Bar No. 24050450